



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

February 20, 2003

Certified Mail No. 7000 1670 0013 9129 3506

Patrick Malloy
President of Operations
Idaho Veneer Co. Inc.
P. O. Box 339
Post Falls, ID 83877

RE: AIRS Facility No. 055-00004 Idaho Veneer Co. Inc., Post Falls
Final Tier II Operating Permit and Permit to Construct

Dear Mr. Malloy:

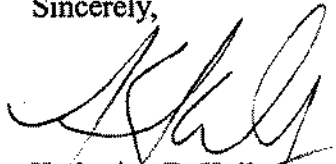
The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. 055-00004 for the Idaho Veneer Co. in accordance with the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively.

The enclosed permit is effective immediately and is based on the information contained in your permit application and all relevant comments received during the public comment period.

Tom Harmon of the Boise Regional Office will contact you regarding a meeting to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Mike Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Katherine B. Kelly
Administrator
Air Quality Division

MS/KB/sm Project No. P-9502-052-1



**Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: 055-00004

AQCR: 62

CLASS: SM

SIC: 2436

ZONE: 11

UTM COORDINATE (km): 505.0, 5282.5

1. PERMITTEE

Idaho Veneer Company Inc.

2. PROJECT

Tier II Permit (Synthetic Minor) and Permit to Construct

3. MAILING ADDRESS

P. O. Box 339

CITY

Post Falls

STATE

ID

ZIP

83877

4. FACILITY CONTACT

Elmer Mattila

TITLE

Director of Personnel, Safety &
Health

TELEPHONE

208-773-4511

5. RESPONSIBLE OFFICIAL

Patrick Malloy

TITLE

President of Operations

TELEPHONE

208-773-4511

6. EXACT PLANT LOCATION

704 E. 4th Street, Post Falls, Idaho

COUNTY

Kootenai

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Veneer and Dimensional Lumber Manufacturing

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment and will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: FEBRUARY 20, 2003

DATE EXPIRES: FEBRUARY 20, 2008

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society of Testing and Materials
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	United States Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in Accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMbf	Million board feet
MMsf	Million square feet
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification Code
SIP	State Implementation Plan
SM	Synthetic Minor
SO ₂	sulfur dioxide
TSP	total suspended particulates
T/yr	tons per year
μm	Micrometers
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER: 055-00004

Permittee: Idaho Veneer Co. Inc.
Location: Post Falls, Idaho

Date Issued: February 20, 2003
Date Expires: February 20, 2008

1. PERMIT SCOPE**Purpose**

- 1.1 The purpose of this permit is to incorporate the requirements of existing permits, limit facility emissions to below major facility classification for Title V and to protect ambient air quality standards.
- 1.2 This permit incorporates and replaces the following permits:
- PTC No. 055-00004 issued December 24, 1993 and amended June 11, 1998.
 - PTC No. 055-00004 issued February 13, 1998

Regulated Sources

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit:

Table 1.1 REGULATED EMISSION SOURCES

Permit Section	Source Description	Emission Controls
3	Wellons wood/bark-fired fuel cell boiler, rated at 40,000 lb/hr steam, installed 1976	Multiclone
	Standby boiler, gas-fired, Cleaver Brooks rated at 13.2×10^6 Btu/hr installed 1971	None
	Thermopak gas-fired boiler rated at 0.6×10^6 Btu/hr	None
4	Wellons Drying Kiln No.1 and Coe Drying Kiln No.2 rated at 1370 bd ft/hr each	None
	Steam Chambers 2, 3, 4, 5, 6, and 7, rated at 1,090 bdf/hr total	None
	Cremona Veneer Dryer rated at 10,100 ft ² /hr (3/8" veneer)	None
	James Dryer No.1 rated at 800 ft ² /hr (3/8" veneer)	None
5	Hog Fuel Cyclone (P-21) Planer Cyclones No.1 and No.2 (P-38 and P-55) Sawdust Cyclone (P-39) Jointer Cyclone (P-13) Resaw Cyclone (P-14) Hog Cyclone (P-16) Sawmill Chip Cyclone (P-17) Veneer Chip Cyclone (P-54) Scragg Chipper Cyclone (P-19)	None

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2. FACILITY-WIDE CONDITIONS

Fugitive Dust

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain a record of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The record shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

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Visible Emissions

- 2.5 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which has greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.6 The permittee shall conduct a quarterly facility-wide inspection of potential point sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from an point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall, at a minimum, include the date and results of each inspection and test, and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.8 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, rules for Control of Open Burning.

Odors

- 2.9 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.10 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Fuel-burning Equipment

- 2.11 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gaseous fuel or 0.20 gr/dscf of effluent gas corrected to 8% oxygen by volume for existing wood-fired equipment.

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Performance Testing

- 2.12 For any performance testing required by this permit, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is strongly encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of method to be used.
- Any extenuating or unusual circumstances regarding the proposed test.
- The proposed schedule for conducting and reporting the test.

Within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit to the Department a compliance test report for the respective test. The compliance test report shall include a description of the process, identification of the method used, equipment used, all process operating data collected during the test period, and test results as well as raw test data and associated documentation, including any approved test protocol.

Monitoring and Recordkeeping

- 2.13 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

Reports and Certifications

- 2.14 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

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Obligation to Comply

- 2.15 Receiving an air quality permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER: 055-00004

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3. BOILERS

3.1 Process Description

The primary purpose of the Wellons boiler and the two natural gas-fired boilers is to generate steam for the steam chambers, dryers and dry kiln.

3.2 Control Description

The PM emissions from the Wellons boiler are controlled by a multiclone. Emissions from the gas-fired boilers are uncontrolled.

Emissions Limits

3.3 Emissions Limits

Emissions of PM₁₀, NO_x, and CO from the boilers shall not exceed any corresponding emissions rate limits listed in the following table:

Table 3.1 BOILER EMISSIONS LIMITS

Source Description	PM ₁₀		NO _x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Wellons Boiler	9.04	32.3	9.4	20.3	25.6	55.3
Gas-Fired Boilers	1.4	2.44	14.4	24.5		

Operating Requirements

3.4 Fuel Specification

The Wellons boiler shall burn only wood waste and bark. The other boilers shall burn only natural gas or propane.

3.5 Fuel Consumption Limits

The maximum fuel consumption in the gas-fired boilers shall not exceed 650 million cubic feet in any consecutive 12-month period. The maximum fuel consumption in the Wellons boiler shall not exceed 19,000 wet tons in any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

3.6 Fuel Consumption Monitoring

The permittee shall monitor and record the amount of gas, wood waste, and bark combusted to demonstrate compliance with Permit Condition 3.5. The annual amount shall be based on a rolling annual summation. The method for monitoring the wood waste combusted shall be approved by the Department.

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3.7 Wellons Boiler Performance Test

Within 12 months from the issuance date of this permit, the permittee shall conduct a performance test to measure opacity and PM emissions from the Wellons boiler. Performance testing and reporting shall follow the procedures listed in Permit Condition 2.12. The results of the PM test shall be used to verify the grain-loading standard in Permit Condition 2.11. The results of the opacity test shall be used to verify compliance with Permit Condition 2.5.

The following conditions shall apply during the performance testing:

- The Wellons boiler shall be operated within 80% of operating design capacity. The operating design capacity for the boiler shall be listed in the test report.
- The amount of wood fuel burned by the boiler shall be monitored and recorded during the test.
- Steam production of the boiler shall be monitored and recorded during the test.

If the PM emissions measured in the initial performance test are less than or equal to 75% of the grain-loading standard listed in Permit Condition 2.11, no further PM testing shall be required during the permit term. If the PM emissions measured during the initial performance test are greater than 75% but less than or equal to 90% of the grain-loading standard, the permittee shall conduct a second performance test during the third calendar year of the permit term. If the PM emissions measured during the initial performance test are greater than 90% of the grain-loading standard, the permittee shall conduct a performance test during each calendar year of the permit term. There shall be a minimum of three months between annual performance tests.

3.8 Wellons Boiler Steam Production Monitor

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a device which continuously monitors the steam production rate of the Wellons boiler.

3.9 Multiclone Operation & Maintenance Manual

Within 60 days of permit issuance, the permittee shall develop and maintain on-site an Operation and Maintenance (O & M) manual for the Wellons boiler multiclone describing the schedule and steps taken to assure the air pollution control equipment will be properly operated and maintained. The O&M manual shall address the operation, maintenance, inspection frequency and repair of the multiclone.

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4. DRYING KILNS AND VENEER DRYERS**4.1 Process Description**

There are two lumber drying kilns, two veneer dryers and six steam chambers permitted for operation at this facility. The equipment uses steam from the boiler.

Emission Limits**4.2 Emission Limits**

Total emissions of PM₁₀ and VOC's from the drying kilns, steam chambers and veneer dryers shall not exceed any corresponding emission rate limits listed in the following table:

Table 4.1 KILNS, DRYERS, CHAMBERS EMISSIONS LIMITS

Source Description	PM ₁₀	VOC
	T/yr	T/yr
Total from kilns, dryers and steam chambers	3.2	24.3

Operating Requirements**4.3 Maximum Facility Throughput**

The maximum dimensional lumber throughput to the drying kilns shall not exceed 23.0 million board feet per year log scale (MMbf/Yr), based on a rolling annual summation.

4.4 Maximum Throughput to Veneer Dryers

The maximum veneer dryer throughput shall not exceed 10.5 MMsf of veneer per year at its equivalent 3/8" thickness, based on a rolling annual summation.

Monitoring and Recordkeeping Requirements**4.5 Facility Log Throughput**

The permittee shall monitor and record, on a monthly and annual basis, the throughput of logs to the facility. The amounts shall be recorded as million board feet per year (MMbf/Yr) based on lumber scale to demonstrate compliance with Permit Condition 4.2. The annual amount shall be based on a rolling annual summation.

4.6 Veneer Throughput

The permittee shall monitor and record the monthly and annual veneer production. The amounts shall be recorded as million square feet per year (MMsf of veneer/yr) to demonstrate compliance with Permit Condition 4.3. The calculations used to determine the throughput shall be based on its equivalent 3/8" thickness. The annual amount shall be based on a rolling annual summation.

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5. CYCLONES

5.1 Process Description

This emission unit consists of 10 cyclones controlling woodworking equipment and transport of hog fuel and sawdust to the Wellons boiler.

Emission Limits

5.2 Emission Limits

Total emissions of PM₁₀ from all facility cyclones shall not exceed the emission rate limits listed in the following table:

Table 5.1 CYCLONES EMISSIONS LIMITS

Source Description	PM₁₀
	T/yr
Total cyclones	22.5

Monitoring and Recordkeeping

5.3 Cyclone Operation & Maintenance Manual

Within 60 days of permit issuance, the permittee shall develop and maintain an Operation and Maintenance (O & M) manual for all facility cyclones which describes the schedule and steps taken to assure the cyclone equipment will be properly operated and maintained. The O&M manual shall address the operation, maintenance, inspection frequency and repair of the cyclones.

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6. SUMMARY OF EMISSION LIMITS**IDAHO VENEER COMPANY, INC. – POST FALLS****Table 6.1 EMISSION LIMITS – HOURLY (lb/hr) AND ANNUAL (T/Yr)**

Source Description	PM₁₀		NO_x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Wellons Boiler	9.04	32.3	9.4	20.3	25.6	55.3
Gas-Fired Boilers	1.4	2.44	14.4	24.5		
Kilns, dryers, chambers		3.2				
Cyclones		22.5				

Notes: Compliance determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

PM and PM₁₀ limits include condensables.

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7. FACILITY-WIDE EMISSIONS INVENTORY

The following table represents the potential to emit for criteria air pollutants for non-fugitive sources at Idaho Veneer. This table is for informational purposes only.

Table 7.1 FACILITY EMISSION INVENTORY BASED ON PTE^a

SOURCE	PM ₁₀	SO ₂	CO	NO _x	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Wellons Boiler	32.3	2.3	55.3	20.3	1.2
Gas-fired Boilers	2.4	0.1	6.1	24.5	1.0
Drying Kilns and Veneer Dryers	3.2				24.3
Cyclones	22.5				
Total	60.4	2.4	61.4	44.8	26.5

^a As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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8. OTHER SOURCES

The table below identifies all other sources at the facility that do not require specific permit conditions to demonstrate compliance with applicable air quality standards.

Table 8.1 SOURCES THAT DO NOT REQUIRE SPECIFIC PERMIT CONDITIONS

Emissions Unit	Description
P7	Schurman Debarker
P8, P33	Chipper No.1 and No.2
P15, P44-P46, P50	Target boxes
P18	Fisher Splicer
P20	Lathe
P22-24	Jointer, planer, and resaw
P26, P28	Clipper No.1 and No.2
P27	Clip/Grade
P29	Veneer chipper
P30, P31	Scragg saw and head rig
P34-P36, P51	Slicer No.1, No.2, No.3, and No.4
P37	Hog (sawmill)
P40-P43	Planer hog, trimmer, sander, and trim saw
P47-P49, P53	Edger, green trim, ring debarker, and hog-chip overs
V1	Gasoline tank
V2	Diesel tank
V3	Oil/lubricant tank
ST4	Wood waste storage
TR2, TR4-TR7	Conveyor belts
ST1	Bark bin to Truck
ST2	Sawdust bin to Truck
ST3	Chip bin to Truck
TR1	Shavings bin to Truck
TR3	Chips to Truck

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9. GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

February 20, 2003

**STATE OF IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PUBLIC COMMENTS
ON PROPOSED TIER II AIR QUALITY PERMIT AND PERMIT TO CONSTRUCT
FOR IDAHO VENEER CO., POST FALLS IDAHO**

Introduction

As required by IDAPA 58.01.01.404.01 (*Rules for the Control of Air Pollution in Idaho*), the Idaho Department of Environmental Quality (DEQ) provided for public comment, including offering an opportunity for a hearing, a Tier II operating permit and permit to construct proposed for the Idaho Veneer Co. facility located in Post Falls, Idaho. Public comment packages, which included the application materials, and proposed permit and technical memorandum, were made available for public review at the DEQ's Coeur d'Alene Regional Office, and DEQ's State Office in Boise. A copy of the proposed permit and technical memorandum was also posted on DEQ's Web site. The public comment period was provided from November 8, 2002 through December 16, 2002, with no public hearing requested. Those comments regarding the air quality aspects of the draft permit are provided below with DEQ's response immediately following.

Public Comments and DEQ Responses

The following comments were received from Idaho Veneer :

- Comment 1: It is Idaho Veneer's understanding that the visible emission rule in IDAPA 58.01.01.625 (Permit Condition 2.3) does not apply to fugitive sources.
 - Response: This is not correct. It should be noted, however, that the visible emission inspections required by Permit Condition 2.4 applies only to point (stack) sources.
- Comment 2: Idaho Veneer contended that emissions for the Wellons boiler were not calculated properly and submitted their own emission calculations based on a revised annual wood throughput limit, revised Btu content of the fuel, and a revised requested steaming limit (40,000 lb/hr).
 - Response: The emissions from the Wellons boiler have been recalculated based on the revised requested limits from the applicant. In addition, the basis of the steam limits and performance testing requirements for the boiler have also been revised. Specifically, the steam rate limit has been removed from the permit. Future performance testing will be completed at 80% of the design steam capacity in order for the test results to be valid, thereby, negating the need for specific steam rate limits. Wood throughput limits will remain in the permit which reflect the emission estimates.
- Comment 3: Idaho Veneer contended that all cyclone emissions should have been calculated using emission factors based on throughput.
 - Response: The cyclone calculations were based on long-standing DEQ guidance (see Emission Estimates discussion in the Technical Memo). No changes have been made other than to incorporate the revised operating hours provided by Idaho Veneer.

- Comment 4: Idaho Veneer requested that the PM₁₀ portion of the source test for the Wellon's boiler required by Permit Condition 3.8 be deleted and the time frame be changed from 1 to 2 years from permit issuance.
 - Response: Because the PM₁₀ NAAQS will still be attained under the conservative assumption that all PM is PM₁₀, the permit limits for PM and PM₁₀ for this source have been made the same and the PM₁₀ test has been deleted. Given the need for the facility to demonstrate compliance with the more stringent PM limits requested by Idaho Veneer, the time period for the initial test is retained at 1 year from permit issuance.
- Comment 5: Idaho Veneer questioned whether Planer Cyclone #2 (P55) was included in the emission calculations.
 - Response: Emissions from this cyclone were included in the proposed permit, which is also clear from the modeling report (see Appendix B, Tables 3 and 4).
- Comment 6: Idaho Veneer requested clarification that the O&M Manual required by permit Condition 5.4 does not need to be submitted to the DEQ.
 - Response: Language has been added to indicate that the Manual is only required to be maintained on site.
- Comment 7: Idaho Veneer requested that the lumber throughput be expressed in "log scale" rather than "lumber scale."
 - Response: The requested change has been made.